

COOLEY LLP
 JEFFREY M. GUTKIN (216083)
 (jgutkin@cooley.com)
 AARTI REDDY (274889)
 (areddy@cooley.com)
 AMY M. SMITH (287813)
 (amsmith@cooley.com)
 JULIA M. IRWIN (352861)
 (jirwin@cooley.com)
 3 Embarcadero Center, 20th Floor
 San Francisco, California 94111-4004
 Telephone: +1 415 693 2000
 Facsimile: +1 415 693 2222

Attorneys for Defendant
 LINKEDIN CORPORATION

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

L.B.,

 Plaintiff,

 v.

 LINKEDIN CORPORATION,

 Defendant.

Case No. 5:24-cv-06832-EJD

**JOINT STIPULATION AND ~~[PROPOSED]~~
 ORDER CONTINUING CASE DEADLINES**

AS MODIFIED

~~J.S.,~~

~~Plaintiff,~~

~~v.~~

~~SPRING FERTILITY HOLDINGS ET AL.,~~

~~Defendant.~~

~~Case No. 5:24-cv-07374-EJD~~

~~**JOINT STIPULATION AND ~~[PROPOSED]~~
 ORDER CONTINUING CASE DEADLINES**~~

V.R.,

 Plaintiff,

 v.

 LINKEDIN CORPORATION,

 Defendant.

Case No. 5:24-cv-07399-EJD

**JOINT STIPULATION AND ~~[PROPOSED]~~
 ORDER CONTINUING CASE DEADLINES**

AS MODIFIED

J.P.,

Plaintiff,

v.

LINKEDIN CORPORATION,

Defendant.

~~L.W.A.,~~

~~Plaintiff,~~

~~v.~~

~~LINKEDIN CORPORATION,~~

~~Defendant.~~

Case No. 5:24-cv-07586-EJD

JOINT STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING CASE DEADLINES

AS MODIFIED

~~Case No. 5:24-cv-08436~~

~~JOINT STIPULATION AND ~~PROPOSED~~~~
~~ORDER CONTINUING CASE DEADLINES~~

Pursuant to Civil Local Rule 6-2, Plaintiff L.B. (“Plaintiff”) and Defendant LinkedIn Corporation (“LinkedIn”) (collectively, “the Parties”), by and through their attorneys of record, stipulate and agree as follows:

WHEREAS, the Parties have conferred, and they agree that this is an appropriate juncture to explore whether *L.B. v. LinkedIn*, No. 24-cv-6832; *J.P. v. LinkedIn*, No. 24-7586; and *V.R. v. LinkedIn*, No. 24-cv-7399 (collectively, the “Actions”) can be amicably resolved;

WHEREAS, the Parties intend to engage in direct negotiations to reach such a mutually-acceptable resolution of the Actions;

WHEREAS, the Parties have also agreed to engage in mediation, if direct negotiations do not produce a resolution of the Actions;

WHEREAS, the Parties are currently working to identify a mutually-acceptable mediator and to schedule a mediation for mid- to late-January 2026, to go forward in the event that the Parties’ direct negotiations do not produce a resolution of the Actions;

WHEREAS, the Parties anticipate that the process of selecting a mediator and reserving a mediation date will take approximately two to three weeks;

WHEREAS, the Parties believe that a short stay of the Actions during these negotiations will increase the likelihood that they can reach a resolution;

WHEREAS, Plaintiffs and Plaintiffs’ counsel do not intend to further pursue claims against LinkedIn in *L.W.A. v. LinkedIn*, No. 5:24-cv-8436 or *J.S. v. Spring Fertility Holdings et al.*, No. 5:24-cv-7374;

WHEREAS, the Plaintiff and the remaining defendant in *J.S. v. Spring Fertility Holdings* (Spring Fertility Holdings, LLC) intend to submit a separate status report addressing the issue of consolidation and setting forth a proposed case schedule; and

WHEREAS, in light of the requested stay of the *L.B.*, *J.P.*, and *V.R.* Actions and the cessation of litigation against LinkedIn in the *L.W.A.* and *J.S.* actions, the Parties agree that the question of consolidation of the actions before this Court would be more appropriately addressed, if necessary, after the proposed mediation.

NOW, THEREFORE, THE PARTIES JOINTLY STIPULATE AND REQUEST:

1. A continuance of all current case-related deadlines in the *L.B.*, *J.P.*, and *V.R.* Actions, including all deadlines related to Plaintiffs amending their complaints in those Actions, until further order of this Court;

2. A continuance of the October 23, 2025 status conference at which the Court had planned to address the question of consolidation, until the Parties determine whether they can resolve the *L.B.*, *J.P.*, and *V.R.* Actions without further proceedings before the Court;

3. That the Parties will file a joint status report with the Court, once they have selected a mediator and a date for the mediation; and

4. That the Parties will file a further joint status report with the Court promptly after either reaching a resolution of the Actions or concluding that the Actions cannot be resolved amicably without further Court proceedings.

IT IS SO STIPULATED.

Dated: October 15, 2025

COOLEY LLP

By: /s/ Jeffrey M. Gutkin
Jeffrey M. Gutkin

Attorney for Defendant
LINKEDIN CORPORATION
in L.B., J.P., and V.R.

Dated: October 15, 2025

KEKER, VAN NEST & PETERS LLP

By: /s/ Matan Shacham
Matan Shacham

Attorney for Defendant
LINKEDIN CORPORATION
in L.W.A and J.S.

1 Dated: October 15, 2025

BURSOR & FISHER, P.A.

2
3 By: /s/ Yitzchak Kopel
4 Yitzchak Kopel

5 Attorney for Plaintiffs
6 L.B., J.P., V.R., L.W.A., and J.S.

7
8 **ATTESTATION**

9 Pursuant to Civil Local Rule 5-1 (i)(3) regarding signatures, I, Spencer McManus, hereby
10 attest that concurrence in this filing of this document has been obtained.

11 Dated: October 15, 2025

12
13 /s/ Spencer McManus
14 Spencer McManus

~~**PROPOSED ORDER**~~

PURSUANT TO STIPULATION, IT IS SO ORDERED.

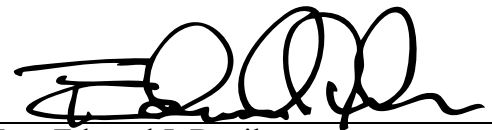
1. All current case-related deadlines in the *L.B.*, *J.P.*, and *V.R.* Actions, including all deadlines related to Plaintiffs amending their complaints in those Actions, are hereby continued until further order of this Court;

2. The October 23, 2025 status conference is hereby ~~vacated and will be reset at a later date, if necessary;~~ continued to February 5, 2026;

3. The Parties to the *L.B.*, *J.P.*, and *V.R.* Actions shall file a joint status report ~~with the Court, once a mediator and a date for the mediation are selected; and~~ by January 29, 2026. The Court may vacate the conference based on the parties' statement.

4. ~~The Parties to the *L.B.*, *J.P.*, and *V.R.* Actions shall file a further joint status report with the Court promptly after either resolving the Actions or concluding that the Actions cannot be resolved amicably without further Court proceedings.~~

Dated: October 16, 2025



Hon. Edward J. Davila
United States District Judge